



Alan C. Lloyd, Ph.D.  
Agency Secretary

# California Environmental Protection Agency

Air Resources Board • Department of Pesticide Regulation • Department of Toxic Substances Control  
Integrated Waste Management Board • Office of Environmental Health Hazard Assessment  
State Water Resources Control Board • Regional Water Quality Control Boards



Arnold Schwarzenegger  
Governor

Certified Mail: 7000 0600 0027 1155 3045

March 28, 2006

Mr. David Koppel, Program Manager  
Mendocino County Environmental Health  
501 Low Gap Road  
Ukiah, California 95482

Dear Mr. Koppel:

The California Environmental Protection Agency (Cal/EPA) conducted a program evaluation of Mendocino County Environmental Health Certified Unified Program Agency (CUPA) on August 17, 2005. The evaluation was comprised of an in-office program review. The state evaluator completed a Certified Unified Program Agency Evaluation, Summary of Findings with your agency's program management staff, which includes identified a deficiency, preliminary corrective action, and a timeframe. Two additional evaluation documents are the Program Observations and Recommendations and the Examples of Outstanding Program Implementation.

I have reviewed the enclosed copy of the Summary of Findings and I find that Mendocino County Environmental Health program performance is satisfactory with some improvement needed. Cal/EPA's Unified Program staff will coordinate with your agency to track the correction of any identified deficiencies over the time frame and schedule included in the Summary of Findings.

Thank you for your continued commitment to the protection of public health and the environment. If you have any questions or need further assistance, you may contact Jim Bohon, Manager, Cal/EPA Unified Program at (916) 327-5097 or [jbohon@calepa.ca.gov](mailto:jbohon@calepa.ca.gov).

Sincerely,

Don Johnson  
Assistant Secretary  
California Environmental Protection Agency

Enclosure  
cc: See next page

David Koppel  
March 28, 2006  
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cc: Mr. John Rogers, Director (Sent Via Email)  
Mendocino County Environmental Health  
501 Low Gap Road  
Ukiah, CA 95482



STATE OF CALIFORNIA  
ENVIRONMENTAL PROTECTION AGENCY



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**CERTIFIED UNIFIED PROGRAM AGENCY EVALUATION  
SUMMARY OF FINDINGS**

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**CUPA: Mendocino County Environmental Health Department**  
**Evaluation Date: August 17, 2005**

**EVALUATION TEAM**

Cal/EPA: Tina Gonzales

This Summary of Findings includes the deficiencies identified during the evaluation, observations and recommendations for program improvement, and examples of outstanding program implementation activities. The evaluation findings are preliminary and subject to change upon review by state agency and CUPA management.

Questions or comments can be directed to Tina Gonzales at (916) 322-2155.

	<b><u>Deficiency</u></b>	<b><u>Preliminary Corrective Action</u></b>	<b><u>Timeframe</u></b>
1	The CUPA has not been inspecting all Farms for their Business Plan requirements/Exemption and Hazardous Waste Generator.	An additional ½ FTE staff person is to be hired September 2005 to assist with these inspections and Business Plan/Hazardous Waste Generator requirements and those will commence shortly. Four of the major Farms have been inspected at this time, with the addition of 20 of the largest farms to be inspected next.	Once training is completed staff will be assigned to check the farms Business Plan requirements and Hazardous Waste Generator information. The CUPA has a plan to inspect 20 of the major farms, after starting out with 4 and plans to have those inspected in the near future. Time Frame for completion: 1 year.

Certified Unified Program Agency (CUPA)  
Evaluation Summary of Findings

CUPA Representative

David Koppel  
(Print Name)

David A. Koppel  
(Signature)

Evaluation Team Leader

TINA M. GONZALES  
(Print Name)

Tina M Gonzales  
(Signature)

Certified Unified Program Agency (CUPA)  
Evaluation Summary of Findings

**PROGRAM OBSERVATIONS AND RECOMMENDATIONS**

1. **Observation:** Staff attends the yearly CUPA Conference and this would be a good thing to include on the Training printouts/records. If the training is listed as "CUPA Conference", it would be hard to tell without listing what classes one attended.

**Recommendation:** It would be a good idea to list what classes were attended at the CUPA Conference to get an idea of what training took place and how many classes staff took part in.

Certified Unified Program Agency (CUPA)  
Evaluation Summary of Findings

**EXAMPLES OF OUTSTANDING PROGRAM IMPLEMENTATION**

1. The CUPA has useful information on their County Environmental Health web site pertaining to HMBP and UST's, and includes links for Laws and Regs, County Policies, and Educational information.
2. The CUPA has a good inspection rate with most of its sites being inspected at least once each year. There is an especially high inspection compliance rate within the Hazardous Materials Business Plan and Hazardous Waste Generator programs which are nearly 100%.
3. The CUPA has achieved a high compliance rate with 90-100% of CalARP sites submitting Risk Management Plans.
4. The CUPA has a good working relationship with the local fire agencies in the area, and offers training to them on a needed basis. This week 2 staff members will be traveling out to the Coast to give Drug Lab training. Environmental Staff have also given training in HMBP.
5. The CUPA also takes part in Emergency Response, 3 staff members in the office do a rotation with the fire agencies during responses to help direct and inform the fire agencies.
6. The CUPA has a goal to conduct annual inspections on all sites. They have a good working relationship with the community being visible at the businesses. The business community seems to be in good compliance, reducing the need for enforcement, and there have been no complaints on the annual inspections.
7. The CUPA seems to have adequate staff to cover most of its programs and inspections, with 4 full time equivalent positions at this point, with the addition of one other ½ FTE coming on board soon to assist with the Farms inspection/business plan duties. Of these duties, a goal to inspect the 20 largest farms will be a big boost to achieve a much needed part of the business inspections.
8. The CUPA has done a good job of collecting fees-90% of the businesses pay on time, which may have to do with time of year of billing-annually in January. Of the very few that have not paid on time, the CUPA has set up a payment schedule, if they choose to use it, some of which have used, and others have paid the late fee.

Certified Unified Program Agency (CUPA)  
Evaluation Summary of Findings

9. The CUPA has sent out Customer Service Survey forms, and those have been returned (48%) with a very high rate of satisfaction. There were many good attached comments with the surveys returned. Of the surveys returned to the office 84% rated the CUPA Excellent, with 12 % in the Good range rating.
10. The CUPA has not had to take formal enforcement on any cases yet, but they do have an AEO process in place which is known about by staff and legal, and can be used if need be for cases.
11. The CUPA Program Manager is constantly attending the Northern and sometimes also the Bay Area CUPA Forum meetings every other month keeping informed of current topics. Meetings are also attended at the Regional Water Board for UST; more recently there is discussion of having the UST meetings the day before the Northern CUPA Forum meeting, so meetings can be combined during visits to that area.
12. The CUPA Program Manager attends the yearly CUPA Conference held in the State, and often the other staff people are able to attend if held in Northern CA area. One person on staff attends Continuing Challenge.